

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

WNI 20-027261
LOGS Legal Group LLP
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Elizabeth L. Wassall, Esq. 023211995
ATTORNEYS FOR HSBC BANK USA, NATIONAL
ASSOCIATION AS TRUSTEE FOR WELLS FARGO
HOME EQUITY ASSET-BACKED SECURITIES 2006-
1 TRUST, HOME EQUITY ASSET-BACKED
CERTIFICATES, SERIES 2006-1

In Re:

EUBIE L. BETHEA,
DEBTOR

Case No.: 20-10061-ABA

Judge: HONORABLE ANDREW B.
ALTENBURG, JR.

Chapter: 13

NOTICE OF OBJECTION TO CONFIRMATION

The undersigned, LOGS Legal Group LLP, attorneys for the Secured Creditor, HSBC Bank USA, National Association as Trustee for Wells Fargo Home Equity Asset-Backed Securities 2006-1 Trust, Home Equity Asset-Backed Certificates, Series 2006-1, the holder of a Mortgage on Debtor's property located at 2438 W. Firth Street, Philadelphia, PA 19132, hereby objects to the Confirmation of the Debtor's proposed Modified Chapter 13 Plan, ECF # 60, on the following grounds:

1) Debtor's proposed Modified Chapter 13 Plan does not provide for the Secured Creditor to receive distributions with a value equal to the allowed amount of its claims required by 11 U.S.C.1325(a)(5)(B)(ii).

2) Debtor's Proposed Modified Chapter 13 Plan provides for an ongoing monthly post-petition payment of \$0.00, but the current monthly obligation is \$239.01, in violation of 11

U.S.C. 1322(b)(5). Secured Creditor requires full monthly post-petition payments owed to Secured Creditor under the terms of the Note and Mortgage.

WHEREFORE, HSBC Bank USA, National Association as Trustee for Wells Fargo Home Equity Asset-Backed Securities 2006-1 Trust, Home Equity Asset-Backed Certificates, Series 2006-1 respectfully requests that the Confirmation of Debtor's Modified Chapter 13 Plan be denied, and that the Debtor be required to file an Amended Chapter 13 Plan providing for full monthly payments due to the Secured Creditor.

LOGS LEGAL GROUP LLP

By: /s/Elizabeth L. Wassall
Kathleen M. Magoon - 040682010
Elizabeth L. Wassall - 023211995

Dated: 2-15-2021

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CERTIFICATION OF SERVICE

I, Chase B. Crawley

1. ☐ represent the _____ in the above-captioned matter.
☒ am the secretary/paralegal for Elizabeth L. Wassall, Esquire, who represents the Secured Creditor in the above-captioned matter.
☐ am the _____ in the above case and am representing myself.
2. On February 16, 2021, I sent a copy of the following pleadings and/or documents to the parties listed in the chart below:
 - Notice of Objection to Confirmation
3. I hereby certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Signature

Dated: February 16, 2021

/s/Chase B. Crawley

Printed Name

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
Eric Clayman Jenkins & Clayman 412 White Horse Pike Audubon, NJ 08106		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court*)
Isabel C. Balboa Chapter 13 Standing Trustee Cherry Tree Corporate Center 535 Route 38 - Suite 580 Cherry Hill, NJ 08002		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court*)
Eubie L Bethea 1068 Lakeshore Dr Camden, NJ 08104		<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court*)
		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court*)

* May account for service by fax or other means as authorized by the court through the issuance of an Order Shortening Time.